8300 Greensboro Dr.
Suite 1200
McLean, VA 22102
www.fcclaw.com

Tom Gutierrez (202) 828-9470 direct (301) 758-5595 mobile ADMITTED ONLY IN DC



September 18, 2013

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: WT Docket No. 12-69

Dear Madam Secretary:

Pursuant to Section 1.1300 et seq. of the Commission's rules, 47 C.F.R., this is to report that on September 16, 2013, Clark Akers, Marcus Mason and Davis Youngblood, all representing Continuum 700 LLC, and the undersigned, representing Continuum and Cavalier Wireless, LLC, spoke via telephone with Brian Regan, Roger Noel and Becky Schwartz of the Wireless Telecommunications Bureau, regarding the need for extensions of time for Lower 700 MHz licensees to construct their systems, and made the following proposal for such extensions:

- (a) The initial interim construction milestone is re-set to the later of December 31, 2016 or the date that AT&T modifies its 700 MHz base station facilities to permit roaming by other 700 MHz carriers, consistent with FCC roaming rules generally.
- (b) The FCC's second construction milestone is reset to a date that is six years beyond the initial milestone set forth in (a) above.
- (c) No initial construction milestone shall be applicable for any Band A licensee where the presence of a Channel 51 licensee, as of this date, restricts wireless construction or operation in any way.

Please direct any questions to the undersigned counsel for Continuum 700 LLC and Cavalier Wireless L.L.C.

Very truly yours,

/s/ Thomas Gutierrez
Counsel for Continuum 700 LLC and
Cavalier Wireless L.L.C.

cc: Brian Regan Roger Noel Becky Schwartz